

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF
ILLINOIS EASTERN DIVISION**

MORGAN KUKOVEC,
INDIVIDUALLY AND ON BEHALF
OF ALL OTHERS SIMILARLY
SITUATED,

Plaintiff,

v.

L'ORÉAL USA, INC. D/B/A
L'ORÉAL PARIS,

Defendant.

Case No. 1:22-cv-03829

Hon. Martha M. Pacold, *presiding*
Hon. Jeffrey T. Gilbert, *Magistrate*

**JOINT MOTION TO SCHEDULE SETTLEMENT CONFERENCE AND STAY
PROCEEDINGS**

Plaintiff Morgan Kukovec (“Kukovec” or “Plaintiff”) and Defendant L’Oréal USA, Inc. (“L’Oréal USA” or “Defendant”) (together, Plaintiff and Defendant are referred to herein as the “Parties”), by and through their respective undersigned counsel, hereby ask this Court to schedule a settlement conference and to stay proceedings pending the outcome of that settlement conference and, in support of this motion, state as follows:

1. On June 16, 2025, the Parties submitted a Joint Status Report informing the Court of the work required to complete Phase 1 discovery. Dkt. 99. In the Joint Status Report, the Parties stated that they were discussing a settlement conference and may request a stay of proceedings pending the outcome of that settlement conference. *Id.*
2. In their Joint Status Report, the Parties also requested an extension of the Phase 1 discovery deadline. Plaintiff requested an extension through December 16, 2025, and

Defendant requested an extension through August 31, 2025. *Id.*

3. On June 30, 2025, the Court extended the Phase 1 discovery deadline through August 31, 2025. Dkt. 101. The Court also scheduled a status hearing for July 9, 2025. *Id.*
4. The Parties have conferred since the Court's June 30, 2025 minute order and, in order to conserve the Parties' and this Court's resources, now request a settlement conference before the Honorable Jeffrey T. Gilbert or another Magistrate Judge in the Northern District of Illinois, as determined and referred to by Judge Gilbert, to discuss resolution of this matter.
5. Further, to avoid additional expenses while engaging in a good faith attempt to resolve this case before Magistrate Judge Gilbert, the Parties request a stay of proceedings pending the outcome of the settlement conference.

WHEREFORE, the Parties respectfully request that the Court enter an Order granting their Joint Motion to Schedule Settlement Conference and Stay Proceedings.

Date: July 7, 2025

Respectfully Submitted,

/s/ Elizabeth C. Chavez

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